

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

CONVERGENT ASSETS LLC,

Plaintiff,

v.

SNAP INC.,

Defendant.

Civil Action No. 6:23-cv-00181-AM

JURY TRIAL DEMANDED

**DEFENDANT’S NOTICE OF CONFLICT AND UNOPPOSED MOTION FOR
CERTAIN COUNSEL OF RECORD TO BE EXCUSED**

On December 6, 2023, the Court granted the parties’ Joint Motion for Hearing and ordered that “all counsel of record appearing on the docket,” among other necessary or interested persons, “shall appear in-person for the hearing” scheduled for January 11, 2024. Dkt. No. 33. Defendant Snap Inc. (“Snap”) respectfully notifies the Court that two of its four attorneys of record—Joshua R. Thane and Kelly Hunsaker—have a conflict with the hearing on January 11, 2024, set by the Court in this matter [Dkt. No. 33.], and respectfully request they be excused from attending the hearing. Counsel for Snap has conferred with counsel for Plaintiff Convergent Assets LLC (“Convergent”) and Convergent does not oppose this motion.

Specifically, Mr. Thane is currently set to attend the Final Pretrial Conference before the Honorable Roy S. Payne, in the United States District Court for the Eastern District of Texas, Marshall Division, on January 12, 2024, at 9:00 AM, in the matter of *Netlist, Inc. v. Micron Technology, Inc., et al*, Case No. 2:22-cv-00203-JRG-RSP. Mr. Thane is local counsel for Micron. In addition, Ms. Hunsaker is currently set to take a deposition on January 11, 2024, in the matter of *Fortinet, Inc. v. Forescout Technologies, Inc.*, No. 3:20-cv-03343-EMC (N.D. Cal.).

Snap's other two counsel of record—Mrs. Jennifer Doan and Mr. Eimeric Reig-Plessis—will attend the hearing set in the matter and are fully capable of presenting argument and responding to any inquiries from the Court regarding this matter. Thus, Snap respectfully requests that the Court excuse Ms. Hunsaker and Mr. Thane from attendance.

Respectfully submitted,

/s/ Jennifer H. Doan

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**ATTORNEYS FOR DEFENDANT
SNAP INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on January 5, 2024.

/s/ Jennifer H. Doan

Jennifer H. Doan